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November 16, 2021

VIA ECF

**MEMO ENDORSED**

Honorable Sidney H. Stein  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: United States v. Victor Rivera, Case No. 21-CR-221 (SHS)

Dear Judge Stein:

This firm represents defendant Victor Rivera in the referenced matter. I write today to respectfully request a brief adjournment of approximately two weeks for the conference currently scheduled in the referenced matter for November 18, 2021 at 10:00 am. I have spoken with Assistant United States Attorney David Abramowicz, who has no objection to the instant adjournment request.

In particular, I have been in continuing intensive, yet productive, discussions with the government concerning the terms of a plea agreement that would resolve the charges against Mr. Rivera herein. While we have reached agreement on the vast majority of the terms of such a plea agreement, issues remain outstanding with respect to the amount of restitution and the amount of forfeiture for which Mr. Rivera will be responsible if he enters into a plea agreement with the government. We believe that the requested adjournment will provide the parties with the additional time necessary to finalize our discussions concerning those two remaining issues and finalize the terms of a plea agreement.

Given the foregoing, we respectfully request an adjournment of approximately two weeks from the currently scheduled November 18, 2020 status conference. Per the government's request, Mr. Rivera consents to the exclusion of time under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), in furtherance of the ends of justice, until the adjourned-to date selected by this Court for the next conference herein.

Thank you for your consideration and attention to this matter.

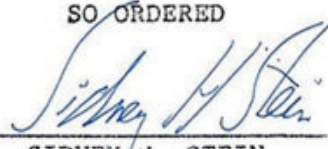
Respectfully submitted,

/s/

Harlan Protass

**The conference is adjourned to December 9 at 11:00 a.m. The time is excluded from calculation under the Speedy Trial Act from today until December 9, 2021. The Court finds that the ends of justice served by this continuance outweigh the best interests of the public and the defendant in a speedy trial pursuant to 18 U.S.C. 3161(h)(7)(A).**

**Dated: New York, New York  
November 17, 2021**

SO ORDERED  
  
SIDNEY H. STEIN  
U.S.D.J.